

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

JESSICA GUASTO,

Plaintiff,

CASE NO.: 1:22-cv-21004-DPG

v.

THE CITY OF MIAMI BEACH, FL,
a Florida municipality, *et al.*

Defendants.

PLAINTIFF'S MOTION FOR HEARING

Plaintiff, JESSICA GUASTO (hereafter referred to as the "Plaintiff"), has called up for hearing on the Court's calendar before the Honorable Edwin G. Torres, on the date and time set forth below, the following matter to be heard:

DATE AND TIME: March 21, 2024, at 2:30 p.m.

JUDGE: The Honorable Edwin G. Torres

LOCATION: James Lawrence King Federal Justice Building
99 N.E. Fourth Street
Courtroom No. 5
Miami, Florida, 33132

MATTER TO BE HEARD

1. The parties dispute whether the Defendant's non-party subpoenas to Plaintiff's former employers are overly broad and irrelevant to the extent they seek "[a]ll documents relating to [Plaintiff]'s separation from employment, which which [*sic*] includes but is not limited to emails and text messages relating to [Plaintiff]'s separation from employment."

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule 7.1(a)(3), I hereby certify that counsel for the Plaintiff has conferred with counsel for Defendant, City of Miami Beach, in a good faith effort to resolve the issues raised. The parties conferred both by telephone conference and then by email and in doing so, they very significantly narrowed the Subpoena dispute, leaving only the single issue that is raised at this time.

Dated: Miami, Florida
March 13, 2024,

DEREK SMITH LAW GROUP, PLLC
Counsel for Plaintiff

/s/ Daniel J. Barroukh
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document is being served on March 13, 2024, on all counsel of record on the service list below via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Daniel J. Barroukh
Daniel J. Barroukh, Esq.

SERVICE LIST

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